

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

TYRONE HENDERSON,
*On behalf of himself and others similarly
situated,*

Plaintiff,

v.

CIVIL ACTION NO: 3:11cv514-REP

VERIFICATIONS INCORPORATED,

Defendant.

**PLAINTIFF'S AMENDED CONSENT MOTION FOR AN EXTENSION OF TIME
TO DISCLOSE EXPERTS UNTIL JUNE 30, 2012**

COMES NOW the Plaintiff, TYRONE HENDERSON, on behalf of himself and all others similarly situated, by counsel, and with the consent of the Defendant Verifications, Inc., to amend his motion for an extension of time to disclose experts until June 30, 2012. (Docket 31). Since the time that the Plaintiff filed his motion, Plaintiff and Defendant have met and conferred, to arrive at an agreement to amend the scheduling order now in force. (Docket 28). The parties have filed an agreed Amended Discovery Scheduling Order as an exhibit to this pleading, which is being circulated among counsel for endorsement. The parties respectfully request the court enter the proposed order.

Respectfully submitted,

TYRONE HENDERSON,
*On behalf of himself and others similarly
situated,*

/s/
Susan M. Rotkis, Esq.
VSB #40693
Leonard A. Bennett, Esq.

VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
srotkis@clalegal.com
lenbennett@cox.net

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June, 2012, I will file the foregoing Motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Charles Kalman Seyfarth
LeClair Ryan PC (Richmond)
Riverfront Plaza - East Tower
951 E Byrd St
Richmond, VA 23219
Email: charles.seyfarth@leclairryan.com

Megan Starace Ben'Ary
LeClairRyan PC (Alexandria)
2318 Mill Road
Suite 1100
Alexandria, VA 22314
Email: megan.benary@leclairryan.com

Counsel for Verifications Incorporated

/s/
Susan M. Rotkis, Esq.
VSB #40693
Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601